

VIA ECF

July 16, 2015

Honorable Paul A. Engelmayer  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Richard F. Ziegler  
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Re: *Chesapeake Energy Corp. v. The Bank of New York Mellon Trust Company, N.A.*,  
No. 13-CIV-1582 (PAE)

Dear Judge Engelmayer:

On behalf of Plaintiff Chesapeake Energy Corporation (“Chesapeake”), I write to report that Chesapeake concurs with the conclusion in the letter to Your Honor dated yesterday and filed on ECF last night by Mr. Robbins, counsel for Defendant The Bank of New York Mellon Trust Company, N.A. (“BNYM”), that the correct amount of prejudgment interest in the above-captioned action should be \$59,067,428.46, rather than \$59,200,132.24 included in Monday’s judgment.<sup>1</sup> Consequently, Chesapeake joins in Defendant BNYM’s request that the Court should enter an amended final judgment with an amount of \$59,067,428.46 in prejudgment interest. Thus, the total judgment should be reduced to \$438,717,561.67.

Separately, Chesapeake requests an unrelated additional correction to the judgment, on the first and second lines of the second page: the judgment as entered requires Chesapeake to pay the judgment amount to unspecified non-parties referenced solely as “the 2019 Noteholders.” We believe the Court intended the judgment to require payment to be made to Defendant BNYM, as indenture trustee, for distribution to those holders of the 2019 Notes who redeemed their notes pursuant to the Special Early Redemption that Chesapeake effected on May 13, 2013.

Accordingly, Chesapeake respectfully requests that the judgment be corrected in both of the respects described above. If the Court prefers or requires a stipulation of the parties to this

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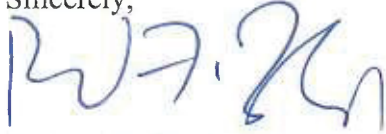
<sup>1</sup> BNYM’s letter states that the difference between the \$59,200,132.24 in the current judgment and the corrected amount of \$59,067,428.46 is \$132,793.78. We believe that this is a typo, as the difference between the two amounts is actually \$132,703.78.

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effect, or a motion for this relief submitted pursuant to Rules 59(e) and/or Rule 60(a), Federal Rules of Civil Procedure, I would appreciate it if the Court would so advise the parties.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. F. Ziegler', with a stylized flourish at the end.

Richard F. Ziegler

cc: Judgments Clerk (by email)

Lawrence S. Robbins (by email)

Paul T. Weinstein (by email)

*Counsel for Defendant Bank of New York Mellon Trust Company, N.A.*